

1 Michael D. Senneff, Esq. (SB 039388)
 2 Bonnie A. Freeman, Esq. (SB 180502)
 2 SENNEFF FREEMAN & BLUESTONE, LLP
 3 50 Old Courthouse Square, Suite 401
 3 P.O. Box 3729
 4 Santa Rosa, CA 95402-3729
 4 Telephone: 707-526-4250
 5 Facsimile: 707-526-0347

5 Attorneys for Defendants County of Sonoma (also sued as Sonoma County Sheriff's Department and
 6 Sonoma County District Attorney's Office), Stephan Passalacqua, J. Michael Mullins, Greg Jacobs,
 7 Christine M. Cook, Russel L. Davidson and James Patrick Casey

8
 9 UNITED STATES DISTRICT COURT

10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 ZACHARIAH JUDSON RUTLEDGE,

12 Plaintiff,

13 NO. CV 07-04274 CW

14 v.
 15 COUNTY OF SONOMA, MICHAEL
 16 POTTS, et al.,

17 Defendants.

18 JOINDER OF DEFENDANTS COUNTY OF
 19 SONOMA , STEPHAN PASSALACQUA, J.
 20 MICHAEL MULLINS, GREG JACOBS,
 21 CHRISTINE M. COOK, RUSSEL L.
 22 DAVIDSON AND JAMES PATRICK CASEY
 23 IN DEFENDANT MICHAEL POTTS'
 24 MOTION TO DISMISS PLAINTIFF'S THIRD
 25 AMENDED COMPLAINT

26 Date: September 16, 2008
 27 Time: 2:00 p.m.
 28 Ctrm: 2 (4th Floor)
 Judge: Hon. Claudia Wilken

20 TO EACH PARTY AND TO ALL ATTORNEYS OF RECORD IN THIS CASE:

21 Come now defendants County of Sonoma (also sued as Sonoma County Sheriff's Department and
 22 Sonoma County District Attorney's Office), Stephan Passalacqua, J. Michael Mullins, Greg Jacobs,
 23 Christine M. Cook, Russel L. Davidson, James Patrick Casey, and Detective Beau M. Martin
 24 (collectively "County Defendants") and join in defendant Michael Potts' Notice of Motion and Motion
 25 to Dismiss Plaintiff's Third Amended Complaint & Motion for More Definite Statement, filed August
 26 12, 2008, and set for hearing on September 16, 2008 in this court. Specifically, County Defendants join
 27 in: Argument 4, Claims for Relief for Conspiracy and Malicious Prosecution (i.e., 7th and 12th causes of
 28 action) are precluded because they do not [sic] allege sufficient facts. (beginning at page 2, Line 13-14

1 of Defendant Potts' Notice of Motion and Motion to Dismiss and discussed at page 14, line 14 through
2 page 15, line 23 of Defendant Potts' Memorandum of Points and Authorities in Support of said Motion).

3 DATED: August 15, 2008 SENNEFF FREEMAN & BLUESTONE, LLP

4

5 By: /s/ Bonnie A. Freeman

6 Michael D. Senneff

7 Bonnie A. Freeman

8 Attorneys for Defendants County of Sonoma, Stephan
9 Passalacqua, J. Michael Mullins, Greg Jacobs, Christine
10 M. Cook, Russel L. Davidson, James Patrick Casey, and
11 Detective Beau M. Martin

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28